

**WOLFF ■ SAMSON**

DAVID SAMSON  
ARTHUR S. GOLDSTEIN\*  
ARMEN SHAHINIAN\*  
THOMAS R. O'BRIEN\*  
GAGE ANDRETTA\*  
DANIEL A. SCHWARTZ\*  
KAREN L. GILMAN  
KENNETH N. LAPTOOK\*  
FREDRIC P. LAVINTHAL  
DAVID M. HYMAN\*  
DAVID L. SCHLOSSBERG  
ROGER J. BRENE  
DAVID N. RAVIN\*  
BERNARD S. DAVIS  
HOWARD J. SCHWARTZ\*  
PAUL M. COLWELL  
ROBERT E. NIES  
MORRIS BIENENFELD\*  
DENNIS M. TOFT  
JEFFREY M. GUSOFF\*  
LAURENCE M. SMITH  
WILLIAM E. GOYDAN\*  
PETER E. NUSSBAUM  
LORI GRIFA\*  
ADAM K. DERMAN  
JEFFREY M. WEINICK\*\*  
A. ROSS PEARLSON\*  
MICHAEL J. NAUGHTON\*  
GEORGE A. SPADORO\*

JOHN F. CASEY  
JAMES D. FERRUCCI  
JOHN A. MCKINNEY JR.  
DARRYL WEISSMAN\*  
MICHELLE A. SCHAA\*  
ADAM P. FRIEDMAN\*  
MITCHELL S. BERKEY\*  
CATHERINE P. WELLS  
JONATHAN BONDY\*  
SEAN M. AYLWARD  
JOHN G. VALERI JR.  
ROBERT H. CRESPI\*  
JAMES P. RHATICAN\*  
JUNIE HAHN\*  
JOSEPH TRIPODI\*  
JILL D. ROSENBERG\*  
JOHN O. LUKANSKI\*  
ROXANNA E. HAMMETT  
RONALD L. ISRAEL\*  
RHONDA CARNIOL\*  
ADAM B. CANTOR\*  
MARGARET WOOD\*  
DORIT F. KRESSEL\*  
THOMAS J. TRAUTNER JR.  
ROBERT L. HORNBY\*  
STEPHEN A. KISKER\*  
TRICIA M. GASPARINE  
NICOLE F. DIMARIA  
KIRAN V. SOMASHEKARA\*

COUNSEL  
AARON D. BASSAN  
JOSEPH ZAVILA  
HOWARD K. UNIMAN  
STEVEN S. KATZ\*  
JUNE S. MELLER\*  
ANDREW S. KENT\*  
ERIC J. LEVINE\*  
STEPHEN G. CORDARO\*  
WARREN BARROWS\*  
DONNA M. EREM  
LEE D. HENIG-ELONA\*  
JOHN P. MALONEY\*  
MARC R. LEPELSTAT\*  
BRUCE D. ETTMAN\*  
TODD W. TERHUNE  
CARLOS G. MANALANSAN\*  
DANIEL D. BARNES\*  
DIANA L. BUONGIORNO  
CHRISTOPHER R. PALDINO  
JOSHUA M. LEE  
DAVID M. DUGAN\*

OF COUNSEL  
CARL B. LEVY  
ASSOCIATES  
JONATHAN A. TYLER\*\*  
MYRNA BLUME  
WILLIAM R. FINIZIO  
ANDREW A. NOBLE\*\*  
MARK A. FORAND\*  
DENISE J. PIPERSBURGH\*  
DANIEL T. MCKILLOP  
FARAH N. ANSARI\*  
ELISA M. PAGANO  
RACHEL C. SANTARLAS\*\*  
STEVEN M. DIPASQUO\*  
XAVIER M. BAILLIARD\*  
MELISSA A. SALIMBENE\*  
MARIE L. MATHEWS\*  
C. NICOLE SULLIVAN\*  
DARREN GRZYB\*  
BETH J. ROTENBERG\*  
BRIAN KANTAR\*  
JAMES M. VAN SPLINTER\*  
CHRISTOPHER W. GEROLD\*  
CHRISTOPHER DEFILIPPIS  
RAJESH V. FOTEDAR\*\*  
ELIZABETH C. YOO\*  
PETER D. SIMON

PATRICIA D. CLEARY\*  
MAURO G. TUCCI JR.\*  
ROHINI C. GANDHI\*  
ARI S. DAVIS\*  
MICHAEL R. CARUSO\*  
WILLIAM J. CANNICI JR.\*  
LAUREN R. DEMAURO  
LINDSAY A. SMITH\*  
JOSEPH G. FENSKE\*  
MARISA A. RAUCHWAY\*  
KEITH E. MORRIS\*  
MICHAEL G. GORDON\*  
BRIELLE M. PERELLI  
CELINE L. BARAKAT\*  
SCOTT C. HOLLANDER\*  
SCOTT W. LICHTENSTEIN\*  
KELLY MCDONOUGH\*  
RAFAEL E. ROSARIO, JR.\*  
MELISSA A. BROWN  
RYAN W. FEDERER\*  
MINDY P. FOX\*  
BRIAN P. O'NEILL\*  
OLEG A. MESTECHKIN\*\*  
MELISSA I. FALK WERNICK\*  
BRIGITTE M. GLADIS  
BARRY S. SOBEL

PATENT AGENT

BRYMER H. CHIN  
KINZA HECHT

**DANIEL D. BARNES**  
One Boland Drive  
West Orange, NJ 07052  
(973) 530-2097  
Fax: (973) 530-2297  
dbarnes@WolffSamson.com

\* MEMBER NJ AND NY BARS  
\* MEMBER NY BAR ONLY  
\* MEMBER MA BAR ONLY  
\* REGISTERED PATENT ATTORNEY  
MEMBER NJ BAR ONLY UNLESS OTHERWISE DENOTED

October 26, 2012

**VIA ECF**

Hon. Madeline Cox Arleo, U.S.M.J.  
United States District Court  
M.L. King, Jr. Federal Building & Courthouse  
50 Walnut Street  
Room 2060  
Newark, NJ 07102

*so needed*  
*M. E. Chiu*  
*Nov 7/12*

Re: Jack Grynberg, et. al. v. Goldman Sachs Group, Inc., et. al.  
Civil Action No. 2:12-cv-03525-CCC-MCA

Dear Judge Arleo:

We represent Defendant The Goldman Sachs Group, Inc. ("TGSG") in the above-referenced matter. Out of an abundance of caution, we write in order to request leave to file an over-length brief with respect to pending motions before the Court. Although we believe that TGSG is entitled to file a brief of up to forty pages, and the brief we expect to file will be no more than 18 pages, with the consent of Plaintiffs' counsel, we ask for leave to file an over-length brief as set forth below.

Specifically, currently pending before the Court is TGSG's motion to transfer or dismiss this action. In response to this motion, Plaintiffs filed both opposition to TGSG's motion and a cross-motion for leave to amend their pleading. Therefore, our reading of Local Rule 7.2 is that the page limit for opposition briefs (40 pages), and not the page limit for replies (15 pages), applies to TGSG's final submission on the pending motions. TGSG expects to file a brief that is no more than a page or two beyond 15 pages as measured pursuant to the type-set criteria set forth in Local Rule 7.2(d). However, because Local Rule 7.2 does not explicitly state that the 40 page limit applies under the circumstances here, we ask for leave to file an over-length brief.

WOLFF & SAMSON PC  
One Boland Drive, West Orange, NJ 07052 • (973) 325-1500 • Fax: (973) 325-1501  
140 Broadway, 46<sup>th</sup> Floor, New York, NY 10005 • (212) 973-0572  
128 West State Street, Suite 3, Trenton, NJ 08608 • (609) 396-6645

[www.wolffsamson.com](http://www.wolffsamson.com)

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We note, however, that Plaintiffs' counsel consents to this application and, as set forth above, we expect our combined reply and opposition brief will be no more than a page or two longer than the 15 page limit.

We thank the Court in advance for its time and attention to this matter.

Respectfully submitted,

*/s/ Daniel D. Barnes*

DANIEL D. BARNES

DDB:lmr